

Compliance Assistance

Robin S. Mack, Compliance Section

South Carolina's Underground Storage Tank (UST) Program provides a number of compliance assistance activities to help UST owners and operators properly operate and maintain their UST systems. The Program's current efforts include:

- **Postcards:** 60 - 90 days before a routine compliance inspection at a facility that was in compliance at the last compliance inspection, we send a postcard to remind the UST owner/operator of the upcoming inspection. The postcard includes due dates for testing as well as a list of the records the inspector will need to see during the inspection.
- **Letters:** 45 - 60 days before a routine compliance inspection at a facility that was in violation at the last compliance inspection, the Program sends a letter to the owner/operator. The letter outlines facility-specific compliance information including the release detection method and necessary testing dates, the records that are required, and additional information that will need to be available during the next inspection.
- **New Owner Outreach:** Within 30 days after the Program receives notice of a transfer of ownership, a compliance inspector makes an outreach visit to the new owner. The purpose of this visit is to introduce the new owner/operator to the Program and to make the new owner/operator aware of the regulations and the requirements for operating the facility. The inspector shares the Program's information on recent testing and record keeping at the facility along with helping the new owner plan testing and record keeping for the future. The inspector schedules additional visits as necessary to help the new owner get a good start.
- **Outreach Training Sessions:** The UST Program provides UST owner and operator operations and maintenance training seminars upon request. These sessions are geared to the specific customer and address facility-specific compliance requirements as well as record keeping and management plans.

The Program will bring the training to the tank owner/operator's office or hold the training at a local government facility. The sessions are free.

- **Help Desk:** Help desk is a weekday UST information service provided by the Program. Anyone with a UST regulatory or clean up question may call during business hours at 800-826-5435 (when calling in SC) or 803-896-6240 and talk to our staff.
- **USTnews:** The newsletter provides information on current UST issues. The newsletter also contains a "Tank Doctor" section that responds to frequently asked questions. Questions may be submitted by e-mail to UST_Help@dhec.sc.gov or by mailing questions to UST Program, Robin Mack, 2600 Bull St., Columbia, SC 29201.

If you have a question or would like to be part of an outreach event, please call 800-826-5435 (when calling in SC) or 803-896-6240. We look forward to working with you.

And The Survey Says ...

Robin S. Mack, Compliance Section

Over the last 3 years, the UST Program has evaluated corrosion protection systems to assess the performance of impressed current and galvanic cathodic protection systems.

During this time, the Compliance Section

tested 1,233 cathodic protection systems. Of the 737 impressed current systems tested, 218 passed, 490 failed, and 29 could not be tested. The pass rate for impressed current systems was 30%. Of the 496 galvanic systems surveyed, 251 passed, 239 failed, and 6 could not

be tested for a 51% pass rate. When the survey results indicated that the cathodic protection system was not providing adequate protection to the tanks and/or piping, we sent a letter to the tank owner/operator to tell them of the potential problem and to encourage

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them to investigate and repair as necessary.

The failure rates we discovered suggest that tank owners might want to monitor corrosion protection systems more often than the intervals required by the regulations. Current state and federal regulations require that corrosion protection systems be tested once every three years. In our survey, we found over half of the corrosion protection systems were not performing satisfactorily. We could not determine how long the unsatisfactory condition had existed, but we feel that the problems could have been discovered sooner with more frequent monitoring.

We were also able to spot some physical signs that the system might not

be working properly even before they began testing. For example, rectifier meters showed "0 amps" and/or "0 volts," the rectifier's internal fuse was blown, anode wires were exposed, anode wires were cut or broken, the breaker that was dedicated to the system was tripped, the rectifier was turned off, electrical service to the station was off, or rectifier readings changed by more than one amp over a 60 day period. Other signs of problems included sparking wires, vanishing rectifier boxes, and junction boxes that had been run over. The survey of galvanic systems pointed out a recurring problem with the tank system being grounded to other structures, usually as the result of routine maintenance, repairs, or upgrades at the facility. Most often this occurred through the electrical conduit being grounded to

tank system components or through the removal of the isolation bushings in the bungholes during installation of monitoring or pumping equipment. When the tank system was grounded in this way, the sacrificial anodes were eaten away quickly and the corrosion protection system failed. A good practice for owners and operators of galvanic systems would be to insure the tank remains electrically isolated after any routine maintenance activities.

The key to having an effective corrosion protection system is routine maintenance and periodic testing. If you think your system is not working properly, contact your contractor or call Robin Mack in the Compliance Section at 803-896-6845 or 800-826-5435 (in SC only) for assistance.

Let's get ORGANIZED.....

Bill Williamson, Compliance Inspector

Have you ever found yourself scrambling to find those records for an upcoming UST inspection? Have you ever thought, "There has got to be a way to keep all of my testing and leak detection records together"? Well, do we have a solution for you! The UST Program has put together a set of tab inserts that you can use in a three-ring notebook to organize your UST records. The tabs are for: Owner/Operator Check List (Repair information, dispenser inspections), Release Detection Records (Automatic Tank Gauge test reports, SIR records, etc), Test Results (Annual line and leak detector test, tank tests), Cathodic Protection Information (3 yr

system test, monthly rectifier log), and Financial Responsibility Certificate.

Just place the records, checklists, etc. into the proper sections and you will have most, if not all, of the required information in one notebook. We know this tool can help you keep better compliance records.

We also know that better records are needed. Many times during inspections, testing records or maintenance records are not available. They may have been misplaced or discarded, or never kept at all. The notebook reminds owners and

operators of what records are needed and provides a convenient place to keep them. The Owner/Operator Check List in section one of the notebook also reminds owners and operators of upcoming test dates, routine maintenance requirements, and best management practices.

If you are trying to get your compliance act together and think that using a set of tabs to organize a compliance notebook would help, let your DHEC UST inspector know. Or, call the Compliance Section at 1-800-826-5435 (from within SC) or 803-896-6240.



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How quickly can I get an inspector to my facility (for an installation or closure)?

Donna Owens, UST Permitting Office

We get this question a lot. To help our inspectors better serve their regularly scheduled customers, we need advance notice (two business days) for UST installation and closure inspections. For example: 

To Schedule An Inspection For	Call By This Day And Time
Monday morning	Wednesday, 4:30 P.M.
Monday afternoon	Thursday, 11:30 A.M.
Tuesday morning	Thursday, 4:30 P.M.
Tuesday afternoon	Friday, 11:30 A.M.
Wednesday morning	Friday, 4:30 P.M.
Wednesday afternoon	Monday, 11:30 A.M.
Thursday morning	Monday, 4:30 P.M.
Thursday afternoon	Tuesday, 11:30 A.M.
Friday morning	Tuesday, 4:30 P.M.
Friday afternoon	Wednesday, 11:30 A.M.

With two-day notice, our inspectors can usually keep the schedule for other customers intact and still give you excellent customer service. The Regulatory Assistance Section manages the installation and closure inspection schedule. You can reach them at 800-826-5435 (from within SC) or 803-896-6240.

The UST Program realizes that weather and other things can cause last minute changes in a schedule. When this happens, the Program will try to reschedule quickly to help

the contractor get back on track. Sometimes, however, the Program cannot make this work because other customers are already in line. In this case, the inspection will have to be rescheduled using the two-business-day guidelines above.

If the Program has to cancel a previously scheduled inspection due to lack of resources, the Program will provide a written exemption, and the inspection will not need to be rescheduled.

What happens if I fail to schedule an installation inspection?

The UST Program will not issue a Permit to Operate for any UST system that has not successfully passed all three phase inspections (or has obtained appropriate written exemptions). The Program may require UST systems that have not been properly inspected to be uncovered for inspection before a Permit to Operate is issued.

Another Release?

Lee Monts, Assessment and Corrective Action Division

As a SUPERB funded cleanup progresses at your facility, you may face these questions. What happens if another release is suspected at my site which is already undergoing cleanup? How does the Program evaluate the situation? What are the consequences?

Sometimes, contractors who are performing a cleanup suspect there is a new or separate release that is impacting their cleanup activities. When a new release is suspected, we ask the cleanup contractor to provide the following:

- Written notification of a suspected new release.
- Any visible evidence of a release (photos, etc.).

- Operational history of the corrective action system at the site.
- Historical analytical and water level data from appropriate monitoring wells.
- Any new data for contaminants not previously seen.
- Other relevant information to include, but not be limited to, change in property use, leak detection records furnished by the UST owner/operator, documentation of surface spills, the presence of above ground storage tanks, possible new sources of contamination on adjacent facilities, etc.

The Regulatory Assistance Section will review the materials and information submitted to determine:

- If there is sufficient justification to initiate a release investigation by UST Program staff; and
- What actions by the UST owner/operator are needed to fully investigate the alleged release. This may include UST system tests at the owner/operator's expense.

Once an investigation has been completed, the Program will notify the contractor and the UST owner/operator of the findings. If the existence of a new release is not supported, the contractor will have to continue cleanup at the original approved cost. If a new release is documented, the contract amount may be negotiated or the contractor may be released from cleanup requirements as appropriate.

Fraudulent Documents: A Costly Decision

Stacey Gardner, Manager, Regulatory Assistance Section

Maybe it's time to renew your proof of financial responsibility. Or, maybe it's time for a required precision test, or an inspection is coming up and you need release detection records. You look at last year's compilation statement or last year's testing results, and perhaps you are tempted to just change the dates and send in forged or fraudulent documents to avoid the cost of new papers. If you might be tempted, you need to know that we look at every document that comes in for validity.

When we suspect that fraudulent or forged documents have been submitted, we call on DHEC's Criminal Investigation Unit to check them out.

Sending in false documents is unlawful, and it can damage a business' reputation. It can also lead to legal action by the DHEC Criminal Investigation Unit. Depending on the severity of the offense, it can even lead to state and/or federal prosecution. Even if the owner/operator is not

prosecuted, the Program will still need the right documents before the violations can be resolved.

Don't be tempted by the "free" price of forged or altered documents. The short-term gain doesn't outweigh the risk. If you are having trouble getting us the information we need, please call us in the Regulatory Assistance Section at 800-826-5435 (from within SC) or 803-896-6240 and talk to us about your situation.

Return Service Requested

Underground Storage Tank Program
SC DHEC
2600 Bull Street
Columbia, SC 29201

March 15, 2005

RE: USTnews Mailing Option

Dear Tank Owner:

In the past, we have depended on owners who owned more than one facility to distribute copies of our newsletter, the **USTnews**, to their facilities. We did this because our mailing address program only supported one mailing address per tank owner. We recently made some changes that will allow us to mail a copy of the **USTnews** to each of your active facilities if you will help us.

If you want us to continue to send multiple copies of the **USTnews** to your office for distribution to your facilities, you need not take any action. Thank you.

If you would like us to mail a copy of the **USTnews** directly to each of your facilities, we need you to provide the appropriate mailing addresses. If you own less than five facilities, you may send us a list of the addresses by mail. Just be sure to include the owner's name, facility ID#, facility name, mailing address, city, state, and zip code.

If you have more than five facilities, we ask that you send us the information electronically in Microsoft EXCEL format. In EXCEL, create a separate column for each attribute, being sure to include the owner's name, facility ID#, facility name, mailing address, city, state, and zip code. Send the files by email to UST_help@dhec.sc.gov. or send us a floppy or cd with the files.

We are also exploring sending electronic copies of the newsletter. If you want to try this, send your email address to UST_help@dhec.sc.gov.

We are excited about these options and hope one suits you. If you have questions, please call Rebecca Lindler or Denise Place at 800-826-5435 (from within SC) or at 803-896-6240.

Sincerely,

John E. Kneece, Editor

ENVIRONMENTAL EXCELLENCE AWARD

The South Carolina Petroleum Marketers Association and the South Carolina Petroleum Council join the UST Program in recognizing the outstanding compliance efforts by this quarter's nominees. The competition was close in each category. The winners can be justifiably proud of their record of compliance and extra effort to protect our environment.

Large Retail (more than ten tanks) - Nominees in this category were:

Expresslane - Hartsville - Brewer Hendley Oil Co., Inc.
Hot Spot 1103 - Pawley's Island - R.L. Jordan Oil of North Carolina
Kangaroo 3215 - Columbia - Pantry, Inc.

The common ingredients in these nominations were immaculate housekeeping, records availability, and monthly operations and maintenance activities above the requirements of the regulation. The winner in this category is **Expresslane, Hartsville. Congratulations, Brewer Hendley Oil Co, Inc.**, and thank you for your consistent efforts to protect and promote our environment.

Small Retail (ten tanks or less) - Nominees in this category included:

Gold Hill Texaco - Fort Mill
Wasson Brothers Store - Laurens
Country Store - Orangeburg

With a record of compliance extending back to their first inspection in 1996, **Nisbet Oil's Gold Hill Texaco** has earned selection as this quarter's winner. The nomination said, "Ready records, attention to detail, and a great attitude." The nomination also commended **Nisbet's** commitment as a supplier to helping their individual customers come into compliance.

In the Non-retail category, the inspector corps nominated:

Air Liquide Industrial - Spartanburg - Air Liquide Industrial US LP
UPS North Charleston - Charleston - United Parcel Service
UPS Greenwood - Greenwood - United Parcel Service

Air Liquide has received back-to-back nominations recognizing their excellent UST operations at two separate facilities. The **Air Liquide Industrial** facility at 1605 Sha Lane, Spartanburg, is the winner in the non-retail category this quarter. **Air Liquide Industrial** US LP has an enviable record of excellence in their UST operations.

